

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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KENNETH CURRY, RICARDO MAZZITELLI :
and JACQUELINE BROWN-PILGRIM, :

Plaintiffs, :

- against - :

P&G AUDITORS AND CONSULTANTS, :
LLC, GRC SOLUTIONS, LLC, PGX, LLC and :
APPLE BANCORP, INC, :

Defendants :

- and - :

GRC SOLUTIONS, LLC and PGX, LLC, :

Crossclaim Plaintiffs, :

- against - :

KDC CONSULTING, LLC, KENNETH :
CURRY (IN HIS CAPACITY AS MANAGING :
MEMBER OF KDC CONSULTING, LLC), :
MAZZITELLI CONSULTING, LLC, :
MAZZITELLI CONSULTING :
INCORPORATED, BROPIL CONSULTING, :
LLC, JACQUELINE BROWN-PILGRIM (IN :
HER CAPACITY AS MANAGING MEMBER :
OF BROPIL CONSULTING, LLC), and :
DENNIS PILGRIM (IN HIS CAPACITY AS :
MANAGING MEMBER OF BROPIL :
CONSULTING, LLC), :

Crossclaim :
Defendants. :

Case No. 20-cv-06985 (LTS)(SLC)

DECLARATION OF
MICHAEL J. GOETTIG

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I, MICHAEL J. GOETTIG, STATE AS FOLLOWS:

1. I am an attorney with the law firm of Davis Wright Tremaine LLP, counsel for defendants/crossclaim plaintiffs P&G Auditors and Consultants, LLC (“P&G”), GRC Solutions, LLC (“GRC”) and PGX, LLC (“PGX”). I make this Declaration in order to introduce certain

documents referenced in the accompanying Memorandum of Law in Opposition to Plaintiffs' Motion for Collective Action Notice.

2. Attached as Exhibit A hereto is a true and accurate copy of a document titled, "Proposal to Apple Bank for Savings to Perform a BSA /AML Transaction Look Back Review," previously filed in support of the motion for summary judgment filed by co-defendant Apple Bank for Savings ("Apple Bank") as Docket Document Number 42-7.

3. Attached as Exhibit B hereto is the Entity Information for Mazzitelli Consulting LLC obtained from the New York State Division of Corporations on January 29, 2021.

4. Attached as Exhibit C hereto are the articles of incorporation for Mazzitelli Consulting Incorporated obtained from the Florida Department of State's Division of Corporations on November 23, 2020.

5. Attached as Exhibit D hereto is a true and accurate copy of a screenshot of Mazzitelli's LinkedIn profile as of January 23, 2021.

6. Attached as Exhibit E hereto is a true and accurate copy of the Declaration of Ricardo Mazzitelli in Opposition to Defendants' [sic] Motion for Summary Judgment previously filed in this action as Docket Document Number 50.

7. Attached as Exhibit F hereto are the Articles of Organization, Certificate of Organization, Annual Registrations and Certificate of Termination for KDC Consulting, LLC ("KDC") obtained from the Georgia Secretary of State's Corporations Division on or around December 23, 2020.

8. Attached as Exhibit G hereto is an Addendum to Master Subcontractor Agreement dated October 9, 2017 between GRC and KDC, previously filed in this action as Docket Document Number 51-1.

9. Attached as Exhibit H is an Addendum to Master Subcontractor Agreement dated January 22, 2018 between GRC and KDC, previously filed in this action as Docket Document Number 51-1.

10. Attached as Exhibit I hereto is a true and accurate copy of Kenneth Curry's LinkedIn profile as of December 10, 2020.

11. Attached as Exhibit J is a Master Services Agreement between GRC and Apple Bank, previously filed in this action as Docket Document Number 42-3.

12. Attached as Exhibit K is a Master Services Agreement between PGX and KDC, previously filed in this action as Docket Document Number 51-4.

13. Attached as Exhibit L hereto are the Articles of Organization, Annual Registrations and Articles of Dissolution for Bropil Consulting, LLC ("Bropil") obtained from the Florida Secretary of State's Corporations Division on or around December 23, 2020.

14. Attached as Exhibit M hereto is the August 31, 2020 order of Magistrate Judge Stewart D. Aaron dismissing the complaint in the action captioned *Bediako, et al. v. P&G Auditors and Consultants, LLC, et al.*, Index No. 19-cv-2527, Document 64.

15. Attached as Exhibit N hereto is a November 30, 2020 e-mail exchange among counsel for the parties in this action.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York.
February 1, 2021

By: /s/ Michael J. Goettig

Michael J. Goettig